

THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

April 12, 2010

Mr. Ray Klimcsak U.S. Environmental Protection Agency – Region 2 290 Broadway 19<sup>th</sup> Floor New York, New York 10007-1866

RE: Acknowledgement of EPA Concurrence

"Evaluation of Soil and Sediment Analytical Results and Recommendation to Complete Soil and Sediment Delineation", dated December 9, 2009

Vacant Lot and Associated Reach of White Sand Branch

Gibbsboro, New Jersey

Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

This letter is to acknowledge receipt of the March 11, 2010 EPA concurrence with the Sherwin-Williams Company's (Sherwin-Williams) proposal to conduct additional soil and sediment sampling at the Vacant Lot and within the associated reach of White Sand Branch. As requested by the EPA in its concurrence, Sherwin-Williams will:

- Analyze all sediment samples for percent solids.
- Revise the comparison criteria used on future figures to be multiples of the New Jersey Department of Environmental Protection (NJDEP) Residential Direct Contact Soil Remediation Standards (RDCSRS), rather than the dual criteria (the RDCSRS and Non-Residential Direct Contact Soil Remediation Standards) used on the figures submitted on December 9, 2009. The following comparison criteria will be used for arsenic and lead, respectively:

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    Arsenic (<19 mg/Kg) - RDCSRS/NRDCSRS</li>
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- Arsenic (38 mg/Kg) 2x RDCSRS
   Arsenic (95 mg/Kg) 5x RDCSRS
- Arsenic (190 mg/Kg) 10x RDCSRS
- Arsenic (>190 mg/Kg) >10x RDCSRS

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Lead (<400 mg/Kg) - RDCSRS</li>
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- Lead (800 mg/Kg) 2x RDCSRS/NRDCSRS
- Lead (2,000 mg/Kg) 5x RDCSRS
   Lead (4,000 mg/Kg) 10x RDCSRS
- Lead (>4,000 mg/Kg) >10x RDCSRS

Units will be specified on all future figures provided to the EPA.

Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,

Mary Low Capillion

Mary Lou Capichioni
Director Remediation Services

CC:

- J. Josephson, EPA (New York)
- W. Sy, EPA (Edison)
- J. Doyon, NJDEP (4 copies)
- P. Parvis, HDR
- J. Gerulis, Sherwin-Williams
- A. Danzig, Sherwin-Williams
- S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione
- H. Martin, ELM
- R. Mattuck, Gradient
- S. Jones, Weston Solutions
- S. Clough, Weston Solutions
- A. Fischer, Weston Solutions